

**Juan C. Chavez**, OSB #136428  
**Franz Bruggemeier**, OSB #163533  
**Alex Meggitt**, OSB #174131  
**Amanda Lamb**, OSB #222284  
Oregon Justice Resource Center  
PO Box 5248  
Portland, OR 97208  
Telephone: 503-944-2270  
Facsimile: 971-275-1839

Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

SKYLER DELGADO, in his capacity and as  
personal representative of the Estate of Robert  
Delgado; ROBERT DELGADO, deceased,

Plaintiffs,

v.

CITY OF PORTLAND; ZACHARY DELONG;  
and JOHN DOES 1-5.

Defendants.

Case No. 3:23-cv-00529-AR

JOINT PROPOSED CASE MANAGEMENT  
SCHEDULE

The parties conferred on August 1, 2023, and propose the following schedule:

- Rule 26 Initial disclosures shall be served by both parties by **September 7, 2023**
- ADR Conference, parties shall confer to discuss ADR options by: (within 120 days from complaint) **November 29, 2023**
- Date by which parties shall file a Joint Alternate Dispute Resolution Report pursuant to LR 16.4: (within 150 days from complaint) **December 29, 2023**

JOINT PROPOSED CASE MANAGEMENT SCHEDULE

- Date by which the pleadings shall be amended to join or add any additional parties, claims, and remedies pursuant to Fed. R. Civ. P. 18 and 19: **March 1, 2024**
- Date by which fact discovery is completed: **May 1, 2024**
- Date by which plaintiffs' expert reports shall be served: **June 3, 2024**
- Date by which defendants' expert reports shall be served: **June 17, 2024**
- Date by which parties' expert rebuttal reports shall be served: **July 1, 2024**
- Date by which expert depositions shall be completed: **August 2, 2024**
- Date by which all dispositive motions shall be filed: **October 2, 2024**

DATE: August 1, 2023

/s/ Juan C. Chavez

Juan C. Chavez, OSB #136428  
Oregon Justice Resource Center  
Of Attorneys for Plaintiff

/s/ William Manlove

William Manlove, OSB #891607  
Portland Office of City Attorney  
Of Attorneys for Defendants

